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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION III**  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

November 29, 1995

Commander, Atlantic Division  
Naval Facilities Engineering Command  
Environmental Quality Division  
Code: 1823  
Norfolk, Virginia 23511-6287  
Attn: Jeff Kidwell

**SUBJECT:** Comments on Site 7 Soils Removal EE/CA,  
Allegany Ballistics Laboratory, Rocket Center, West Virginia

Dear Mr. Kidwell:

Thank you for the opportunity to review the draft Engineering Evaluation/Cost Analysis (EE/CA) for the Beryllium Landfill, Site 7 Soils at Allegany Ballistics Laboratory, Rocket Center, West Virginia.

These comments are presented as general comments and as specific comments related to selected pages or to selected topics.

**GENERAL COMMENTS**

The discussion for Alternative 1 should be expanded to clarify that the plan is to dispose of the segregated soils, which meet the health-based criteria, at Site 5.

A copy of the EE/CA Approval Memorandum should be included in the Appendix.

There is an existing Community Relations Plan for response activities at ABL. It may be appropriate to update the Plan before the removal action.

For Removal Actions undertaken by other lead agencies, the EPA must approve sampling and analysis plans. The proposed removal action will require environmental sampling and the creation of a sampling and analysis plan. Sampling will be required during the soil segregation to assess the remediation level, and for the selected disposal option. The Sampling and Analysis Plan, prepared with the design/action work plans should be provided to the EPA and WVDEP so that the proposed scheduled discussed on page 25 is not delayed.

## SPECIFIC COMMENTS

Page ES-1 List the current contract-operator, Alliant Techsystems Inc.

Page ES-2 Include the third goal; compile analytical results

Page ES-2 Clarify that the plan includes disposal of the residual soils in the Site 5 landfill.

Page 1 List the current contract-operator, Alliant Techsystems Inc.

Page 5 Section 1.1 stipulates a 30 day public comment period. EPA generally finds 45 days to be a more adequate period for public comment. Extensions to the public comment period could also be made available if necessary for this non-time critical action. Additionally, the EE/CA should also be available at the public library in Short Gap, West Virginia.

Page 7 The correct Site number is WV0170023691.

Page 30 Clarify that the segregated soils, that meet the health-based screening levels, will be disposed of in the Site 5 landfill. The discussion on this page may be misleading because Site 5 is not a Subpart D or Subpart C landfill.

Page 38 The Administrative Feasibility of Alternative 3 should include a discussion of the need for a waiver to a permit for long-term storage of hazardous waste at ABL.

Page 39 Cost evaluations for Alternative 3 should include the long-term monitoring and reporting costs.

Page 41 Clarify and repeat that the selected alternative includes the plan to dispose of the segregated soils at the Site 5 landfill.

If you have any questions concerning these comments, please call me at (215) 597-2317.

Sincerely,



Bruce W. Beach  
Remedial Project Manager  
Federal Facilities Section

cc: Tom Bass, WVDEP  
Wendy Noe, MDE